

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
THE UNITED STATES OF AMERICA,

-against-

Sequan Jackson

Defendant

22 Cr. 352 (JSR)

**DECLARATION OF  
SUSAN KELLMAN  
IN SUPPORT OF  
PRETRIAL MOTIONS**

I, SUSAN KELLMAN, ESQ., declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney duly admitted to practice before this Court and in the State of New York.
2. This Declaration, the Memorandum of Law submitted herewith, and the exhibits submitted and incorporated herein, are respectfully submitted in support of Sequan Jackson's Motion to Suppress as set forth in the Notice of Motion and Memorandum of Law.
3. I have reviewed the government's disclosures of Title III applications and orders in this case.
4. I have received 3500 material from the government for forty-four named witnesses in this case.
5. I have reviewed the government's transcripts from the calls intercepted during the Title III Interceptions and identified Sequan Jackson as a participant in forty-two calls intercepted on co-defendant Smith's phone.
6. On November 11, 2021 at approximately 2:50 PM co-defendant Smith initiated an interview with the NYPD. The purpose of this interview was to discuss First Response's operations. Smith did this after learning that the NYPD spoke to the owner of another fire mitigation company about First Response.
7. The exhibits annexed hereto and referenced in the Memorandum of Law are as follows:

EXHIBIT A	HSI Special Agent William Clark Affidavit in Support of Application for Title III Interceptions, October 14, 2021
EXHIBIT B	HSI Special Agent William Clark Affidavit in Support of Application for Extension of Title III Interceptions, November 12, 2021
EXHIBIT C	Application for Sealing Order Upon Termination of Interception, December 14, 2021
EXHIBIT D	First Periodic Report Pursuant to the November 12, 2021 Order Authorizing Interception of Wire Communications, November 22, 2021
EXHIBIT E	Second Periodic Report Pursuant to the November 12, 2021 Order Authorizing Interception of Wire Communications, December 3, 2021
EXHIBIT F	Selected Portions of Cellebrite Examination of Forensic Extraction of Co-Defendant Jatiek Smith, March 2, 2021
EXHIBIT G	Excerpts from Title III Interception Transcripts Containing the Word "Chat"

WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, I respectfully request that the Court grant the relief sought in the Defendant Sequan Jackson's Notice of Motion.

Dated: Brooklyn, New York  
February 13, 2023

TO: DAMIAN WILLIAMS, ESQ.  
United States Attorney  
Southern District of New York

Attn: Adam Hobson, Mollie  
Bracewell, Rushmi Bhakaran,  
Eliz. Espinosa.  
Assistant United States Attorneys

*Susan G. Kellman*

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